

EXHIBIT

A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, *ex rel.*
ALEX DOE, Relator, THE STATE OF
TEXAS, *ex rel.* ALEX DOE, Relator, THE
STATE OF LOUISIANA, *ex rel.* ALEX DOE,
Relator,

Plaintiffs,

V.

PLANNED PARENTHOOD FEDERATION
OF AMERICA, INC., PLANNED
PARENTHOOD GULF COAST, INC.,
PLANNED PARENTHOOD OF GREATER
TEXAS, INC., PLANNED PARENTHOOD
SOUTH TEXAS, INC., PLANNED
PARENTHOOD CAMERON COUNTY,
INC., PLANNED PARENTHOOD SAN
ANTONIO, INC.,

Defendants.

No. 2:21-cv-022-Z

Date: September 1, 2023

EXHIBIT A

Unredacted Information in Plaintiffs' Appendices

Filing	Appendix Page	Document Name	Non-Party Contact Info.
475-3	Appx. 1312	Polin Barazza Deposition Transcript	Non-Party Name (Initials A.C.)
475-3	Appx. 1341	Polin Barazza Deposition Transcript	Non-Party Name (Initials A.C.)
475-4	Appx. 2706	Email from Dixon re PPGC-PC-Patient Access Center	Non-Party Names and Email Addresses (Initials A.B., R.C., D.M., E.P., Y.R., M.V., M.W., E. G.)
475-4	Appx. 2707	Email from Dixon re PPGC-PC-Patient Access Center	Personal Cell Phones (ending -71 and -34)
475-11	Appx. 5577	Email from McKinney re NextGen BBP	Non-party Names (Initials K.L., B.Q.)
475-11	Appx. 5587	Email from Exnicious re Denial Review	Non-Party Name (Initials B.M.) Personal Cell Phones (ending -54 and -25)
475-11	Appx. 5641	Email re Talking Points for the Board; dated April 6, 2016	Board Member's Personal Email Address (n-----@yahoo.com)
475-12	Appx. 5675-6029	Affiliate Defendants' Third Privilege Log	Personal email addresses for board members and employees and non-public employee names throughout ¹
475-13	Appx. 6030-6121	Affiliate Defendants' First Privilege Log	Personal email addresses for board members and employees and non-public employee names throughout
482-1	Appx. 6500	Email re Talking Points for the Board; dated April 6, 2016	Board Member's Personal Email Address (n-----@yahoo.com)
482-1	Appx. 6769	Email re Ruth Green Award; dated February 14, 2017	Board Member's Personal Email Address (m-----@gmail.com)
482-1	Appx. 6776	Email re Ruth Green Award; dated February 14, 2017	Board Member's Personal Email Address (m-----@gmail.com) Board Member's Home Address (-----, Houston, TX)

¹ Each privilege log has hundreds of entries and hundreds of names or email addresses that need redaction. Instead of listing each here, Affiliate Defendants will provide Relator with a redacted version of each log to use in the Appendix.

482-1	Appx. 6777	Email re Ruth Green Award; dated February 14, 2017	Board Member's Home Address (-----, Houston, TX)
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ALEX DOE, Relator, THE STATE OF
TEXAS, *ex rel.* ALEX DOE, Relator, THE
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OF AMERICA, INC., PLANNED
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TEXAS, INC., PLANNED PARENTHOOD
SOUTH TEXAS, INC., PLANNED
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INC., PLANNED PARENTHOOD SAN
ANTONIO, INC.,

Defendants.

No. 2:21-cv-022-Z

Date: September 1, 2023

EXHIBIT B

Additional Non-Party Contact Information Defendants Seek to Redact

Filing	Appendix Page	Document Name	Non-Party Contact Info.
475-1	Appx. 436	PPGT Electronic Funds Transfer (ETF) Notification	Non-Party Name (Initials S.E.)
475-4	Appx. 2586 through Appx. 2593	PPGC Louisiana Medicaid Provider Group Agreement (email with attachment)	Personal Cell Phone (ending in -54)
475-5	Appx. 2739	PPFA Accreditation & Evaluation Department Accreditation Introductory Call Overview, Script & Communications Template	Non-Party Names (Initials E.I., E.P., A.B., T.H., and D.F.)
475-6	Appx. 3211	PPFA 2012 PPGC Accreditation Report	Non-Party Name (Initials E.D.)
475-6	Appx. 3448	PPFA 2016 PPST Accreditation Report	Personal E-Mail Address (a-----@gmail.com)
475-6	Appx. 3547	PPST Corrective Action Report (Binder 5(A) Tab 506)	Personal E-Mail Address (u-----@gmail.com)
475-7	Appx. 3662	PPFA 2012 PPST Accreditation Report	Non-Party Name (Initials E.D.)
475-7	Appx. 3793	Email from Lambrecht to Olson fw Final accreditation report for Planned Parenthood of Greater Texas	Personal E-Mail Address (n-----@yahoo.com)
475-7	Appx. 3872	Email from White to PPFA re accreditation corrective action plan	Personal E-Mail Address (n-----@yahoo.com); Personal Cell Phone (ending in -06)
475-7	Appx. 3885	Email from Johnson to Lambrecht; Frances attaching PPGT Draft Summary Outcome Presentation	Personal Cell Phone (ending in -03)
475-7	Appx. 3904	Email from White to Lambrecht et al re Accreditation Resources	Personal Cell Phone (ending in -06)

Filing	Appendix Page	Document Name	Non-Party Contact Info.
475-8	Appx. 4111 through Appx. 4112	PPFA Consolidated Financial Statements and Supplementary Information	Confidential Foundation Founders Names (Initials A.F., A.C.B.M.F., B.F., C.T.F., C., D.F., D.L.P.F., D.F., F.F., G.F., G.F., H.F., H.F., I.H.F., I.A.F., I.F., J.C.K.F., J.F., L.D.G.F., M.C.F., P., P.F., R.F.F., R.F.F., R.F., S.R.M.F., S.F.F., S.F., U.U.W.F., U.N.F., W.F.H.F., W.F., B.F., B.P., C.F., F.M.K.F., I.A.F., and W.F.
475-8	Appx. 4118	PPFA 2021 PPGT Access to Care Medicaid Gap Funding Grant Agreement	Personal Cell Phone (ending in -77)
475-8	Appx. 4131	PPFA 2021 PPGT Access to Care Medicaid Gap Funding Grant Agreement	Personal Cell Phone (ending in -77)
475-8	Appx. 4140	PPFA 2017 Email re Gap Funding Approach & Additional Contingency Planning Details	Personal Cell Phone (ending in -34)
475-8	Appx. 4389	PPFA Health Care Investment Program Year 1-4 Reports	Personal Cell Phone (ending in -13)
475-10	Appx. 4866	Email from K. Custer to Affiliate CEOs; Subject: Information Request for NPS Motion; dated Mar. 10, 2015; attachments: Highlights from PPFA Program Support for Affiliates; PPFA National Office Services to Affiliates; NPS and Financial Comparison for Affiliates; Health Care Business Model Project	Personal Cell Phone (ending in -34)
475-10	Appx. 4977	Email from R. Exnicious re: Introduction to PPFA's Medicaid Reimbursement Toolkit; dated Oct. 28,	Personal Cell Phone (ending in -54)

Filing	Appendix Page	Document Name	Non-Party Contact Info.
		2019; attachment: Medicaid Reimbursement Toolkit	
475-10	Appx. 5011	Email from D. Singiser to K. Lambrecht re: Medicaid Follow-Up Questions; dated Jul. 6, 2017	Personal Cell Phones (ending in -77 and -46)
475-10	Appx. 5012 through Appx. 5013	Email from K. White to M. Turner re: Medicaid Element of Performance (EOP); dated Oct. 21, 2015	Personal Cell Phones (ending in -06 and -32)
475-10	Appx. 5017	Email from PPFA to Affiliates re: Compliance & Medicaid, Health Care Reform Update Newsletter	Personal Cell Phone (ending in -09)
475-10	Appx. 5024	Email from PPFA to Affiliates re: Compliance & Medicaid, Health Care Reform Update Newsletter	Personal Cell Phone (ending in -15)
475-10	Appx. 5070	PPFA Email re: NPS Dues Forgiveness	Personal Cell Phones (ending in -06 and -71)
475-10	Appx. 5077	Health Care Investment Program Update for Oct. 2, 2014	Personal Cell Phones (ending in -23 and -87)
475-10	Appx. 5127	Email re: TX Medicaid termination and whether termination is “paused” during appeal, dated Dec. 21, 2016	Personal Cell Phone (ending in -34)
475-10	Appx. 5128	Email from PPFA to Affiliate CEOs re: PPFA’s Medicaid Gap Fund for Affiliates out of Medicaid	Personal Cell Phone (ending in -34)
475-10	Appx. 5139 through Appx. 5140	PPFA Email re: Talking points for Wendy Davis to discuss Texas Medicaid defunding and litigation; dated Oct. 20, 2015	Personal Cell Phones (ending in -77 and -15)

Filing	Appendix Page	Document Name	Non-Party Contact Info.
475-10	Appx. 5150	PPFA Emails to Board Chairs and Affiliate CEOs re: Meeting on Potential Future Options	Personal E-Mail Address (n-----@gmail.com)
475-10	Appx. 5151	PPFA Emails to Board Chairs and Affiliate CEOs re: Meeting on Potential Future Options	Personal E-Mail Addresses (c----@m-----.com, a-----@hotmail.com, l-----@gmail.com, b-----@gmail.com, m-----@yahoo.com, a-----@aol.com, p-----@comcast.net, a-----@c-----.com, j-----@aol.com, j---@l-----.com, m-----@e-.org, c-----@mac.com, k-----@verizon.net, c-----@gmail.com, j-----@gmail.com, and k----@me.com)
475-10	Appx. 5157	PPFA Email re: New Clinic Budget Sheet	Personal Cell Phone (ending in -31)
475-10	Appx. 5189	Email from Trivisonno re New PPFA Building Book for Health Centers	Personal Cell Phone (ending in -13)
475-10	Appx. 5193	Email from Sueyoshi to Affil COOs; Affil-PSDs; Affil Chief Execs; Affil CAPS AB; Affil Medical Directors re Direct to Patient Medication Abortion Mail Order Pharmacy Information	Personal Cell Phone (ending in -39)
475-10	Appx. 5209	Email from PPFA to Texas Affiliate Medical Director welcoming to PPFA	Personal Cell Phone (ending in -80)
475-10	Appx. 5219	Updated from ARMS dated Mar. 2016 re: portraying Planned Parenthood as excellent and stable amid media scrutiny	Non-Party Names (Initials C.B., N.B., C.C., G.C., J.C., W.G., D.H., D.J., T.P., M.R., and J.S.)
475-10	Appx. 5220	PPST Compliance, Quality Improvement & Risk Management	Non-Party Name (Initials A.S.)

Filing	Appendix Page	Document Name	Non-Party Contact Info.
		Committee Meeting Agenda with materials; dated Nov. 10, 2016	
475-10	Appx. 5304 through Appx. 5306	Email to K. Lambrecht RE: Directors and Officer's Policy with policy attached; dated May 21, 2021	Personal Cell Phones (ending in -31 and -77)
475-10	Appx. 5318	Email from T. Trivisonno to M. Baxter with Powerpoint and information regarding PPFA Business Operations Team guidelines for assessing Health Center labor and performance; and NCL playbook attached	Personal Cell Phone (ending in -13)
475-10	Appx. 5442	PPFA Email to Affiliate CEOs sharing preview materials for upcoming National Conference; dated Mar. 17, 2021	Personal Cell Phone (ending in -03)
475-10	Appx. 5453	Research & Analysis: An Audit by Script Architecture prepared for PPFA re: facility upgrades to PP Affiliates; PowerPoint presentation; dated Mar. 30, 2020	Non-Party Names (Initials D.R., A.M., T.L., and J.Z.)
475-10	Appx. 5520	Email to Affiliate Senior Leadership and Admins; Subject ACEC Meeting Agenda and Materials (with attachments); dated Feb. 24, 2016	Personal Email Address (k-----@yahoo.com); Non-Party Name (Initials S.F.)
475-10	Appx. 5522 through Appx. 5523	Email to Affiliate Senior Leadership and Admins; Subject ACEC Meeting Agenda and Materials (with attachments); dated Feb. 24, 2016	Non-Party Names (names of the President and CEOs of over 60 Non-Party Affiliates and several other Non-Party Names)
475-10	Appx. 5536	Email to Affiliate Senior Leadership and Admins; Subject ACEC Meeting	Non-Party Names (Initials J.A.C.)

Filing	Appendix Page	Document Name	Non-Party Contact Info.
		Agenda and Materials (with attachments); dated Feb. 24, 2016	
475-10	Appx. 5563 through Appx. 5564	Email to Affiliate Senior Leadership and Admins; Subject ACEC Meeting Agenda and Materials (with attachments); dated Feb. 24, 2016	Non-Party Names (Initials S.F., B.Z., B.H., and K.G.)
475-11	Appx. 5579	Emails received by PPGT regarding the 60-Day Medicaid/Medicare Overpayment Repayment Rule	Personal Cell Phone (ending in -17)
475-11	Appx. 5651	PPFA Email to Affiliates re: Health Care Reform Update Newsletter – June 2013 Issue	Personal Cell Phone (ending in -15)
475-13	Appx. 6123	Email from K. Lambrecht with subject: 5th Circuit Ruling re: Planned Parenthood in Medicaid and attaching the Court’s Opinion; dated Nov. 23, 2020	Personal Cell Phone (ending in -77)
475-13	Appx. 6126	Email from K. Lambrecht with subject: 5th Circuit Ruling re: Planned Parenthood in Medicaid and attaching the Court’s Opinion; dated Nov. 23, 2020	Personal Cell Phone (ending in -13)
475-13	Appx. 6128	Email from K. Lambrecht with subject: 5th Circuit Ruling re: Planned Parenthood in Medicaid and attaching the Court’s Opinion; dated Nov. 23, 2020	Personal Cell Phone (ending in -71)
475-13	Appx. 6131	Email from K. Lambrecht re: Texas affiliates’ termination from Medicaid	Personal Cell Phone (ending in -77)

Filing	Appendix Page	Document Name	Non-Party Contact Info.
		and PPGT and PPFA talking points, dated Oct. 19, 2015	
475-13	Appx. 6142 through Appx. 6143	Email from McKinney to Sannes re 5th Circuit Ruling re Planned Parenthood in Medicaid	Personal Cell Phones (ending in -31 and -77)
482-1	Appx. 6602 through Appx. 6603	Email re Friday's SAP/PPGC Meeting; dated March 1, 2017	Personal Cell Phones (ending in -13, -58, and -12)
482-1	Appx. 6641 through Appx. 6642	Email re Wendy Davis National Media Tonight; dated October 20, 2015	Personal Cell Phones (ending in -77 and -15)
482-1	Appx. 6662 through Appx. 6663	Email re Minutes from August 2019 Fiduciary Committee Meeting; dated October 15, 2019	Personal Cell Phone (ending in -65) Non-Party Name and Contact Information (Initials T.P.; t----@fiallc.com)
482-1	Appx. 6672	Email re agenda and background materials for 2/6 & 2/7 mtgs; dated February 4, 2013	Personal Cell Phone (ending in -23)
482-1	Appx. 6677 through Appx. 6678	Email re agenda and background materials for 2/6 & 2/7 mtgs; dated February 4, 2013	Non-Party Names (Initials T.H., P.G., C.H., N.O., N.G., K.H., M.C., D.L., T.Z., S.H., C.F., L.C., A.K.)
482-1	Appx. 6692	Email re DHHS OIG Release of New Guidance for Health Care Boards; dated April 21, 2015	Personal Cell Phone (ending in -36)
482-1	Appx. 6761	Email re Update from Foundational Group; dated May 4, 2018	Personal Cell Phone (ending in -52)
482-2	Appx. 6871	Email re Upcoming Webinar on New Managed Care Rule; dated May 25, 2016	Personal Cell Phone (ending in -05)

Filing	Appendix Page	Document Name	Non-Party Contact Info.
482-2	Appx. 6877	Email re Upcoming Webinar on New Managed Care Rule; dated May 25, 2016	Personal Cell Phone (ending in -05)
482-2	Appx. 6879	Email re 5th Circuit Ruling re: Planned Parenthood in Medicaid; dated November 23, 2020	Personal Cell Phone (ending in -77)
482-2	Appx. 6884	Email re Medicaid Issues in the Media; dated October 19, 2015	Personal Cell Phone (ending in -77)
482-2	Appx. 6885	Email re Very interesting from PPFA; dated February 5, 2014	Personal Cell Phone (ending in -09)
482-2	Appx. 6892	Email re Very interesting from PPFA; dated February 5, 2014	Personal Cell Phone (ending in -15)
482-2	Appx. 6974	Email re President Biden Takes Action on Sexual and Reproductive Health; dated January 29, 2021	Personal Cell Phone (ending in -77)
482-2	Appx. 6985	Email re President Biden Takes Action on Sexual and Reproductive Health; dated January 29, 2021	Personal Cell Phone (ending in -71)
482-2	Appx. 6988 through Appx. 6992	Email re Restricted PPOL email for Texas; dated September 11, 2021	Personal Cell Phones (ending in -77 and -59)
482-2	Appx. 7041	Email re Gap Funding Approach & Additional Contingency Planning Details; dated June 29, 2017	Personal Cell Phone (ending in -34)
482-2	Appx. 7042 through Appx. 7045	Email re GPO Agreement Renewal; dated December 17, 2013	Non-Party Names and Contact Information (names, emails, and phone numbers for Initials T.R., J.B.) Personal Cell Phone (ending in -77)

Filing	Appendix Page	Document Name	Non-Party Contact Info.
482-2	Appx. 7166 through Appx. 7167	Email re following up – contract scope, material from the archives re: Lozier report; dated January 27, 2017	Non-Party Name and Contact Information (Initials A.H., m-----@gmail.com; Initials M.C., m----@brownmccaroll.com, phone number ending in -68; Initials L.G., l----m----@brownmccaroll.com, phone number ending in -78) Personal Cell Phone (ending in -29)
482-2	Appx. 7172	Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives	Non-Party Names (Initials M.G., J.S.)
482-2	Appx. 7175	Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives	Non-Party Names (Initials M.G., J.S.)
482-2	Appx. 7179	Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives	Non-Party Name (Initials M.G.)
482-2	Appx. 7208	Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives	Non-Party Name and Contact Information (Initials J.S., j----@AG.ny.gov)
472-1	116	Excerpts from 10/6/2022 Expert Report of Louis G. Dudney	Personal Cell Phone (ending in -78)